

# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

IN RE: SHALE OIL ANTITRUST  
LITIGATION

Case No. 1:24-md-03119-MLG-LF

This Document Relates to All Actions

**DECLARATION OF MATTHEW MATHIS**

I, Matthew Mathis, declare as follows:

1. I am Vice President, Permian Operations for Pioneer Natural Resources USA, Inc., a Delaware corporation (“Pioneer USA”), which is a wholly-owned subsidiary of Pioneer Natural Resources Company, also a Delaware corporation (with Pioneer Natural Resources Company and Pioneer USA collectively referred to herein as “Pioneer”). Effective May 3, 2024, Pioneer Natural Resources Company became a wholly-owned subsidiary of Exxon Mobil Corporation, a New Jersey corporation. The following facts are true and correct based on my personal knowledge and information obtained from the business records of Pioneer.

2. During the period January 1, 2021, through the present, all of Pioneer’s offices were located in Texas, and none of Pioneer’s officers, directors, and employees officed in New Mexico, California, or Nevada. During that period, Pioneer’s shale oil operations have occurred exclusively in Texas. All of the oil that Pioneer produces and sells is oil produced and sold in the Permian Basin in Texas. Pioneer conducts all its oil activities from its offices in Texas or at the oil and gas properties that it operates in Texas, and Pioneer makes all decisions concerning the production and sale of oil exclusively in Texas.

3. During the period January 1, 2021, through the present, Pioneer has not operated shale oil wells in New Mexico, Nevada, or California. During that period, Pioneer has not conducted any shale oil operations, produced or sold shale oil, or made any decisions about the production or sale of oil in New Mexico, Nevada, or California.

4. During the period January 1, 2021, through the present, Pioneer has not owned any interest in any wells in Nevada or California. As for New Mexico, Pioneer has owned non-operating working interests in ten oil-producing wells in New Mexico and overriding royalty interests in seventy-seven oil-producing wells in New Mexico, but these investments are merely passive and represent only a small fraction of the ownership interests in these wells. Pioneer receives purely monetary payments from its passive investments in those eighty-seven wells and has neither received nor sold crude oil from these New Mexico wells nor made any production-related decisions with respect to those wells. During the four-year period January 1, 2021, through December 31, 2024, the revenue to Pioneer associated with those eighty-seven New Mexico wells represented less than 2/100ths of 1 percent of Pioneer's total revenues.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on February 21, 2025, at 3617 N. Big Spring, Midland, Texas.

By:   
Matthew Mathis